

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITE HERE HEALTH, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	CIVIL ACTION
	)	
vs.	)	NO. 13 C 7633
	)	
7 EAST 54TH STREET ASSOCIATES, LLC,	)	JUDGE ELAINE E. BUCKLO
d/b/a BICE RISTORANTE,	)	
	)	
Defendant.	)	

**MOTION FOR ENTRY OF DEFAULT AND JUDGMENT**

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendant, 7 EAST 54TH STREET ASSOCIATES, LLC, d/b/a BICE RISTORANTE, in the total amount of \$261,332.16, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$2,418.75.

On November 13, 2013, the Summons and Complaint was served on the Defendant by tendering a copy of said documents to Bagtha Seddik at the Defendant's place of business (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on December 4, 2013. Defendant filed its answer on January 3, 2014. Defendant's counsel, however, withdrew from its representation. Defendant is required to be represented by counsel in this Court. As Defendant has failed to timely retain counsel to defend its answer to the Complaint, Plaintiffs respectfully request entry of default and judgment.

/s/ Laura M. Finnegan

### **CERTIFICATE OF SERVICE**

The undersigned, an attorney of record, hereby certifies that she electronically filed the foregoing document (Motion for Entry of Default and Judgment) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by US Mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 19th day of February 2014:

7 East 54th Street Associates, LLC,  
d/b/a Bice Ristorante  
7 East 54th Street  
New York, NY 10022

/s/ Laura M. Finnegan

Laura M. Finnegan  
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